

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DEBRA JOYCE CLACKLER

Plaintiff(s),

v.

GLADYS DEESE, ET AL.

Defendant(s).

2:06-CV-172-WHA

SPECIAL REPORT AND ANSWER OF DEFENDANT GLADYS DEESE

COMES NOW Gladys Deese, by and through the Attorney General for the State of Alabama, the Honorable Troy King, and submits the following Special Report and Answer:

1. This Defendant notes that there are no specific allegations against this Defendant in the body of Plaintiff's Complaint and that she is listed only in the heading, and her alleged address is given.
2. This Defendant adopts by reference as if herein set out in full the Special Report (Doc. #11) and Answer (Doc. #10) filed by Frank Albright.
3. This Defendant asserts that Plaintiff's Complaint does not meet the heightened pleading requirement of a 42 U.S.C. §1983 action and for that ground, fails to state a cause of action against this Defendant.
4. This Defendant submits as **EXHIBIT I** the affidavit of Gladys Deese.

Respectfully submitted,

TROY KING
Attorney General

/s/ Jeffery H. Long
Jeffery H. Long
Assistant Attorney General

ADDRESS OF COUNSEL:

Office of the Attorney General
11 South Union Street
Montgomery, AL 36130
(334) 242-7300

CERTIFICATE OF SERVICE

I hereby certify that I have, this the 14th day of August, 2006, electronically filed the foregoing with the Clerk of Court using the CM/ECF system and served a copy upon the Plaintiff by placing same in the United States Mail, postage prepaid and properly addressed as follows:

Debra Joyce Clackler, AIS 159516
Tutwiler Prison for Women
8966 US Hwy 231 N
Wetumpka, AL 36092

/s/ Jeffery H. Long
Jeffery H. Long
Assistant Attorney General